

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

TAYLOR LINK, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

MARSHALL HOTELS & RESORTS, INC.;
MARSHALL PAYROLL SERVICES, LLC;
OASIS OUTSOURCING CONTRACT, INC.

Defendants.

Civil Case No.:
3:20-cv-00805-DNH-ML

**STIPULATION EXTENDING TIME FOR DEFENDANTS MARSHALL HOTELS &
RESORTS, INC. and MARSHALL PAYROLL SERVICES, LLC TO RESPOND TO THE
COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties
in the above referenced action as follows:

1. The attorneys for Plaintiff and Defendants Marshall Hotels & Resorts, Inc. (MHR) and Marshall Payroll Services, LLC (MPS) submit this Stipulation to the Court in response to the Court's text order issued September 21, 2020 (DKT. No. 27), which requests "a status report explaining why Plaintiff does not seek default."

2. Plaintiff does not seek a default against Defendants MHR and MPS because counsel for Plaintiff agreed to provide those defendants an extension of time to file their responsive pleading before the time for their answer to the Complaint had expired.

3. On September 2, 2020 William M. Hogg, Attorney for Plaintiff and putative Class Members, granted an extension of three (3) weeks to answer the complaint to Defendants MHR and MPS. Mr. Hogg communicated this agreement to Eric T. Baginski, Attorney for Defendant Oasis Outsourcing Contract II, Inc. Mr. Baginski previously informed Mr. Hogg that he did not

represent MHR and MPS but was making this request on their behalf while those defendants obtained counsel.

4. On September 18, 2020, Clemente J. Parente, Attorney for MHR and MPS called Mr. Hogg to inform him that Jackson Lewis, PC would be representing MHR and MPS. After discussing with Mr. Hogg his understanding of the deadline for MHR and MPS to file their response to the Complaint, Mr. Parente requested that Mr. Hogg agree that MHR and MPS's deadline to file a responsive pleading to the Complaint be extended to September 29, 2020. Mr. Hogg agreed.

5. Accordingly, the parties have stipulated and agreed that the time for Defendants MHR and MPS to file a responsive pleading should be extended through September 29, 2020, and respectfully request that the Court "so order" this stipulation and enter an order approving that extension of time.

Dated: September 24, 2020

ATTORNEYS FOR DEFENDANTS
MARSHALL HOTELS & RESORTS, INC.;
MARSHALL PAYROLL SERVICES, LLC;

By: /s/ Clemente J. Parente
Clemente J. Parente (Bar No. 301897)
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Dated: September 24, 2020

*ATTORNEYS FOR PLAINTIFF TAYLOR
LINK, Individually and behalf of all others
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By: /s/ William M. Hogg
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SO ORDERED 9/25/2020


Miroslav Lovric
U.S. Magistrate Judge